

**In The Matter Of:**  
*Valencia Colon v.*  
*Richard Roundtree et al*

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*Chrislynn Kuhlke*  
*February 4, 2022*

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*Kellie K. Rodman, LLC*  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION

Valencia Colon, )  
Plaintiff, )  
v. ) Civil Action File No.  
Richard Roundtree, et al., ) 1:21-cv-00149-JRH-BKE  
Defendants. )

The videotaped videoconference deposition of  
CHRISLYNNE KUHLKE, taken for purposes of discovery,  
cross-examination, and all other purposes allowed  
under the Civil Practice Act of Georgia; all  
formalities waived; the reading and signing of the  
deposition waived; before Jennifer A. Gerber, CCR  
6241-2465-4151-2704, Certified Court Reporter, in  
and for the State of Georgia; commencing at  
9:13 a.m., February 4th, 2022, Augusta, Georgia.

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APPEARANCES (Remote)

ON BEHALF OF THE PLAINTIFF:

J. WICKLIFFE CAUTHORN, ATTORNEY AT LAW  
The Cauthorn Firm  
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404-991-2700

ON BEHALF OF THE DEFENDANTS:

TAMEKA HAYNES & RANDOLPH FRAILS, ATTORNEYS AT LAW  
Frails & Wilson, LLC  
211 Pleasant Home Road, Suite A1  
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800-413-9005

ALSO IN ATTENDANCE:

ERIC GEORGE, VIDEOGRAPHER

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I N D E X

CROSS-EXAMINATION BY MR. CAUTHORN . . . . . Page 5

DIRECT EXAMINATION BY MS. HAYNES . . . . . Page 50

E X H I B I T S

EXHIBIT NUMBER	DESCRIPTION	PAGE MARKED/ IDENTIFIED
D	Event Contract 1/31/22	20/20
E	Event Contract 1/16/19	24/24
A	Open Records Request Production	25/26
C	Title 6 License and Business Regulations	39/39

TRANSCRIPT LEGEND

. . . (ellipsis)	Halting speech or an unfinished sentence in dialogue or an omission when reading written material
-- (dashes)	Break in speech continuity
(ph)	Spelled phonetically
(sic)	In its original form



P R O C E E D I N G S

9:13 a.m.

(Whereupon, the court reporter complied with the requirements of O.C.G.A. 9-11-28(c).)

BY THE VIDEOGRAPHER: This is the deposition of Chrislynn Kuhlke for Colon versus Roundtree. Today's date is February 4th, 2022. The time is 9:13 and we are on the record.

THE COURT REPORTER: Okay. And, again, today's date is February 4th, 2022 and the time is 9:13. This is the case of Colon versus Roundtree. At this time, can everyone state their name and who they represent, please?

MR. CAUTHORN: Yes. My name is Wick Cauthorn. I represent the Plaintiff, Valencia Colon.

MS. HAYNES: Tameka Haynes. I'm from Frails and Wilson representing the Defendant.

THE WITNESS: Oh, Chrislynn Kuhlke. I represent the City of Augusta.

THE COURT REPORTER: Thank you very much. And my name is Jennifer Gerber. I am the court reporter. We are all appearing via Zoom today. Do all parties agree to have the witness sworn remotely?

MR. CAUTHORN: Yes.

MS. HAYNES: Yes.

THE COURT REPORTER: Thank you.

1 (Whereupon, the witness was sworn remotely by the court  
2 reporter per agreement of counsel.)

3 Whereupon,

4 CHRISLYNNE KUHLMKE

5 Was called as a witness herein and, having been first duly  
6 sworn, was deposed and testified as follows:

7 CROSS-EXAMINATION

8 BY MR. CAUTHORN:

9 Q Ms. Kuhlke, can you, for the record, say your full  
10 name and -- and spell it for me?

11 A Mary, M-A-R-Y, Chrislynnne, C-H-R-I-S-L-Y-N-N-E,  
12 Kuhlke, K-U-H-L-K-E.

13 Q Okay. And where are you employed?

14 A I'm employed with Augusta Recreation and Parks  
15 Department.

16 Q What is your position with the -- with the -- with  
17 the parks department?

18 A I'm with -- the rentals and facilities coordinator.

19 Q How long have you been there?

20 A I got my pin yesterday, 35 years.

21 Q Oh, my God. That's -- that's fantastic.

22 A Yes.

23 Q Not a lot of people have been anywhere for 35 years  
24 nowadays, so that's -- that's --

25 A Yes, uh-huh (affirmative).

1 Q It must be a good environment to work in.

2 A Uh-huh (affirmative), okay.

3 Q So you were identified by defense counsel in this  
4 case as someone -- we discussed some topics that would be --  
5 that would be covered during some depositions. And, you know,  
6 when you take a deposition of an -- of an entity -- you know,  
7 Augusta doesn't have a mouth and it can't talk for itself, so  
8 it has to have -- have people designated to speak for it.  
9 And -- and so you have been identified by defense counsel as  
10 someone who is authorized to talk about the parks and  
11 recreation department policies with regard to planning of  
12 events and the planning of events at the public facilities. Is  
13 that -- is that your understanding about what you're here for?

14 A Correct.

15 Q Okay, okay. And so we'll -- we'll stick to that, and  
16 specifically I wanna talk -- we'll talk generally about --  
17 about planning of events, and then specifically I would like  
18 to -- I'm gonna have some questions about an event that was  
19 June 14th of 2019 at the Julian Smith Casino. And then --  
20 and then we'll talk about -- about policies and ordinances and  
21 how they -- how the parks department interacts with other  
22 departments and things like that with regard to the planning  
23 and permitting process, okay?

24 A Okay.

25 Q Okay. So can -- if -- let's say that I wanted to

1 have an event at Julian Smith Casino. Well -- well, let me ask  
2 you first: Has the process changed today -- is the process any  
3 different today than it was in -- in June of 2019?

4 A No.

5 Q Okay. So let's suppose I wanted to have an event at  
6 Julian Smith Casino where I was gonna have -- rent the -- rent  
7 the place from the county and I was gonna serve beer and wine  
8 to my guests and things like that. How would I approach the  
9 county? And walk me through that process with -- with the  
10 parks department and how -- how we get that planned and done  
11 and scheduled.

12 A Okay. Basically, you would come straight to me. And  
13 I have a contract and -- we do a lot of this now online, so  
14 I -- I don't know if you consider that a change, but it --  
15 it -- we do some of this online, but I still go through the  
16 policies and procedures with whoever's renting.

17 When it comes to alcohol, the first question I ask: Are  
18 you -- are you -- are you giving this alcohol away? Are you  
19 selling it? Because you have to have a day license if you're  
20 selling that alcohol or, you know, in any way selling it to the  
21 people that are coming.

22 And once they tell me, no, I'm -- I'm giving it away, or I  
23 am, you know, selling it; I direct them to either the -- the  
24 license department -- which they have to have in writing with  
25 the license department that they are having to go get a one-day

1 license -- or, no, we're giving it away. So I go from there  
2 and I -- and I let them know that they will have to have a  
3 police officer if you are having alcohol on the premises. It  
4 doesn't matter if you have 150 people, 200 people, or 2 people.  
5 You still will have to have a police officer if you are having  
6 alcohol.

7 Q Okay. And when you say a police officer, is that --  
8 do they -- is that -- can it be a -- a special duty off duty  
9 police officer, or did they have to be on the clock and in  
10 uniform and -- and all of that?

11 A What we do is we contact the police department and --  
12 and we give them a copy of the contract and tell them that --  
13 whatever that -- they are -- need for that event. And they  
14 email us back in -- in writing. They let us know who -- who is  
15 needed and they give us the name of the person that will be  
16 working that event. We have contacts with the police  
17 department that we go to.

18 Q Understood, because they have people that they --  
19 they will -- all that kind of scheduling on their side; is --

20 A Correct, correct.

21 Q Okay. And -- and when you say the police department,  
22 do you work with just the police department, or do you also  
23 work with the sheriff's office?

24 A Well, I work with the sheriff's office -- I mean, the  
25 police department, and we do have some marshals that do work

1 the events also, along with firemen. You know, we have firemen  
2 that you have to get to -- also. And I have a --

3 Q So you work --

4 A So I --

5 Q You broke up.

6 A -- contacts with the firemen and the police officers  
7 and the marshals.

8 Q Understood.

9 A Yeah, I --

10 Q Okay. How -- how long does that process take? Let's  
11 say that from contacting you, and then you helping them  
12 understand what they need to do as far as licensing and  
13 approval goes, how long does that process typically take?

14 A Well, I mean, if you have to get a license, you --  
15 for -- you know, if you're selling, it takes about -- at least  
16 three months in advance to get one. Now, if you've already got  
17 a license to sell alcohol, you have -- still have to get a day  
18 license. And -- and if you have a license, you can get that  
19 real quick. You can get that within a week. But if you're  
20 like giving it away or -- you know, or bringing it yourselves,  
21 then -- then you don't have to have anything --

22 Q Okay.

23 A -- far as license-wise.

24 Q Okay. So if you're giving it away, that would be  
25 like a wedding reception without -- it doesn't have a cash bar?

1           A     Correct.

2           Q     Okay. Or a -- or a --

3           A     -- anything like that.

4           Q     Okay. And they -- they don't have to get a day  
5 license -- can you explain to me what a day license is, when  
6 you say a day license?

7           A     Basically -- basically it's -- it's -- we've been  
8 working with the licensing department a long time. So it's --  
9 basically, it is if they're selling on the premises and money  
10 is being exchanged, they have to have a day license showing  
11 that they have bought a day license for that actual event. It  
12 has to be out on the wall showing that they have a day license.  
13 In that case -- inspection department, so I don't understand  
14 the whole thing about it, but that's -- you have to have one.

15          Q     Okay, understood.

16               MR. CAUTHORN: And -- and I actually -- Jennifer, did  
17 we swear in the witness?

18               THE COURT REPORTER: (Nods head.)

19 BY THE WITNESS: (Resuming)

20          A     Yeah.

21          Q     I'm sorry, I was looking at my notes, I think, when  
22 you were getting sworn in. Okay.

23          A     Yeah.

24          Q     So I -- I wanna make sure that I understand this.  
25 Okay, so -- so there is just a general county license that

1 allows someone to sell alcohol, correct? And that's just a  
2 general license where they can sell it at their location,  
3 right?

4 A Right, correct.

5 Q Okay. But if they're using a park property for a  
6 single event for one day, even if they've got one of those  
7 licenses to sell alcohol generally, they still have to get a  
8 day license to serve it at the --

9 A Right.

10 Q -- at the event at the park property?

11 A Right. It has to have Julian Smith Casino on the  
12 license.

13 Q Okay, okay. And so that's what you mean, when you  
14 say a day license, you're talking literally about the same type  
15 of a license that a restaurant or bar would have except that it  
16 is specifically for one day at a park property?

17 A Correct. At a -- at a building.

18 Q Okay. And if you don't have a general bigger  
19 license, that means you have to go through the whole process  
20 of -- of -- and that's why you said it would take three months  
21 or so, because you've got to go through a whole licensing  
22 process --

23 A Right. You have to be a nonprofit -- you have to be  
24 a nonprofit to get a -- to get a day license if you don't have  
25 another license. You cannot just -- you know, Joe Smith can go



1 out there and get a day license. You can't do that. It has to  
2 be a nonprofit.

3 Q Okay.

4 A Correct.

5 Q So if my daughter was getting married -- if my  
6 daughter was getting married at Julian Smith, we'd have to have  
7 a -- an open bar. We couldn't have a cash bar if we wanted  
8 to --

9 A Pretty much. Pretty much.

10 Q -- because -- because --

11 A Unless you've got someone --

12 Q -- nobody --

13 A -- who already had an alcohol license. Like let's  
14 say -- alcohol license --

15 Q Okay.

16 A And so they could serve alcohol and sell it.

17 Q So a caterer could do it?

18 A A caterer, correct.

19 Q Okay. So I could have an event where I had a caterer  
20 running the bar, and the caterer could get the license -- the  
21 day license --

22 A Correct, correct.

23 Q -- using their own license?

24 A Correct.

25 Q Okay, understood. And who has to sign off on that

1 license? Does the sheriff have to review that license and sign  
2 off on it?

3 A No, the sheriff does not. The -- the license  
4 inspection gives them a day license and it has to be signed and  
5 put on the wall -- and we have to have it on the wall before  
6 they can sell.

7 Q Okay. And is -- is that something that would be in a  
8 file for a -- for an event?

9 A Not necessarily, no. We don't -- we don't file them,  
10 no. We just have to have them on the wall before they -- we --  
11 to be honest with you, we don't have a lot of -- of cash bars.  
12 We really don't.

13 Q Understood, understood. If -- let's say an event is  
14 selling tickets and giving out wristbands for drinks, does that  
15 count as selling alcohol?

16 A It is -- it does. If -- if the ticket includes  
17 alcohol, that -- that -- that is -- is -- is a -- is a selling  
18 event, so, yeah -- yes, that is.

19 Q Okay, okay. So that's -- that -- that's kind of what  
20 I was asking. Because, you know, I know a lot of people would  
21 say, okay, well, it's gonna be \$20 a ticket and we've got a  
22 plate of barbeque and -- and you get a beer -- you know, two --  
23 two beer coupons with it. So that would be a -- that would be  
24 a selling event?

25 A Correct.

1 Q Okay, okay.

2 A Now, if you bring your own or whatever, that is not  
3 selling. We do have BYOB, bring your own.

4 Q And that's where the individual guests bring their  
5 own?

6 A Correct.

7 Q Okay. The -- if individual guests are bringing their  
8 own alcohol, does -- do they still have to get all the approval  
9 for alcohol, or -- or is that just a -- just it -- it -- go  
10 ahead and explain that.

11 A It should -- you don't have to have a license if  
12 you're bringing your own.

13 Q Okay. What if the alcohol is free? What's the  
14 process that has to -- has to be gone through if you're just  
15 providing alcohol for free at your event?

16 A You just -- I just have to -- I have to assign a  
17 police officer. They cannot, I do. I go through my --

18 Q Okay. And that --

19 A I send the contract. They send me a person. And  
20 then we -- we have the police officer.

21 Q Okay. Who pays -- who pays for the police officer?

22 A The -- the people that are renting.

23 Q Okay, all right. And my understanding is Julian  
24 Casino -- Julian Smith Casino is -- is an Augusta parks and rec  
25 property where there are these types of events.

1 A Right.

2 Q Okay. Do you know, or have you ever heard of 25  
3 Gents?

4 A I sure have.

5 Q Okay.

6 A Twenty-five Gents has been with us over 30 years.

7 Q Okay.

8 A So --

9 Q What is 25 Gents?

10 A It's -- it's a club. I mean, it's -- it's like a --  
11 it's like any of the fraternity-type -- it's just a club.

12 Q Okay. Just a social club?

13 A Yes.

14 Q Okay. Who were the people that -- or your contacts  
15 at 25 Gents?

16 A For a long time I've worked with Willie Washington.  
17 And he's gotten a little bit older, so I work a little bit with  
18 Randy Knox now. And I'm very close to that group because I've  
19 been with them that long.

20 Q And when you say that long, is that -- are -- are you  
21 a member of 25 Gents, or do --

22 A Oh, no.

23 Q -- they use the property all the time?

24 A They have used that facility as long as I have been  
25 in my position. Every year pretty much at the same time.

1 Q Okay, okay. And what type of -- of an event do they  
2 have. You just said they use it every year. What's the event  
3 that they have?

4 A I mean, they have an event right before Father's Day  
5 and it's just a Father's Day get together. And then they have  
6 one in November. I think it's something like a white party.  
7 They're just parties.

8 Q Okay, okay.

9 A Yeah, parties -- get together --

10 Q Do they have a standing permit or any kind of  
11 standing application with the parks department, or do they get  
12 a -- they go through the process individually each time they  
13 wanna --

14 A No. Everybody has to go through the process each  
15 time -- each time, every time.

16 Q Okay. Do they usually sell alcohol, or do they just  
17 provide it for free?

18 A They -- they -- they -- well, they have a BYOB, which  
19 is bring their own.

20 Q Okay. Is sheriff or police security required at a  
21 BYOB?

22 A Yes, sir. Anytime alcohol is on the premises you  
23 have to have police officers.

24 Q Okay. So they have to go through you to get the  
25 security, but they -- they don't go through that licensing

1 process when they have their event?

2 A Correct.

3 Q Okay. Do you know if they sell tickets to their  
4 event?

5 A I don't -- I -- I am not sure. I don't -- I don't --  
6 I think they -- I'm not sure. I'm not positive. I would have  
7 to go back. Some of -- they have before in the past, but -- I  
8 think they do.

9 Q Okay. Do you know what's included in the ticket?

10 A I -- I think just the -- just the food and the -- and  
11 they have to pay for the building and all that, but it sure --  
12 it's not -- I know it's not alcohol because the people bring  
13 their own alcohol.

14 Q Okay. And you -- by the people -- when you say the  
15 people, you mean the individual guests to the event?

16 A Correct, correct.

17 Q Okay. And I looked -- I was provided from you  
18 guys -- y'all provided a pretty substantial open records  
19 response to me. I sent an open records request to -- to y'all  
20 and it's a pretty substantial response. And it -- the -- the  
21 request was for documents related to the permitting of events  
22 in the year of 2019.

23 A Uh-huh (affirmative).

24 Q And I did not see any -- any paperwork related to any  
25 event at -- for the 25 Gents or for Julian Smith Casino on June

1 14th of 2019. Do you know where that paperwork would be?

2 A Are you speaking of the contract?

3 Q Yes. Whatever documents would be in a file at  
4 Augusta -- at -- with you guys. I didn't get -- in the -- in  
5 the documents produced, I didn't see anything related to an  
6 event at Julian Smith Casino. And -- and -- and the reason I'm  
7 asking about this is because I'm getting ready to start asking  
8 you about a specific event on June 14th of 2019.

9 A Uh-huh (affirmative).

10 Q And I didn't see anything related to an event that  
11 day at all. And then I didn't see any paperwork related to 25  
12 Gents at all. And I was --

13 A I did -- I can -- I can give you that contract right  
14 now. It's in my --

15 Q Okay.

16 A -- computer.

17 Q Okay.

18 A Yeah, uh-huh (affirmative).

19 Q Okay. In about -- in -- in -- in -- I'm gonna ask  
20 you some questions in about -- and then -- can we take a five  
21 minute break and you -- and you can email Tameka that -- that  
22 contract? And then I -- and then -- because I'm -- because I'd  
23 like to talk to you.

24 A Okay, sure.

25 Q Okay. And I'm not -- you know, I -- y'all produced

1 like a hundred and -- almost 200 pages worth of -- worth of  
2 documents that -- I went through it multiple times and I never  
3 saw anything about 25 Gents or an event at -- on June 14th,  
4 2019 or anything at Julian Smith Casino with 25 Gents or  
5 June 14th, 2019. So if you could find that -- those documents  
6 and email them to Tameka and she can email them to me.

7 A Okay.

8 Q We can take a few minutes to do that and then I can  
9 ask you questions about that and I'll have those documents in  
10 front of us.

11 A Sure.

12 Q Okay.

13 A Yes, June 14th, two thousand -- what was is,  
14 nineteen?

15 Q Nineteen.

16 A Okay.

17 THE VIDEOGRAPHER: And we were off --

18 MR. CAUTHORN: All right --

19 THE VIDEOGRAPHER: Off --

20 MR. CAUTHORN: Let's --

21 THE VIDEOGRAPHER: I'm sorry, go ahead.

22 MR. CAUTHORN: Yeah, let's -- let's mute up until  
23 about 9:45, and then we'll come back and -- and -- and --  
24 and look at these documents.

25 THE VIDEOGRAPHER: And we are off the record at 9:33.



1 (Whereupon, a brief recess ensued.)

2 THE VIDEOGRAPHER: And we are back on the record at  
3 9:48.

4 BY MR. CAUTHORN: (Resuming)

5 Q Okay. Ms. Kuhlke, you just -- my understanding is  
6 you just provided your -- well, you just provided defense  
7 counsel with a copy of a document that's in the parks and  
8 recreation department's computer files; is that right?

9 A (No audible response.)

10 Q You're muted.

11 A That's correct.

12 Q Okay. And this is a document that reflects the --  
13 the event held by 25 Gents Inc. at the Julian Smith Casino on  
14 June 14th of 2019; is that correct?

15 (Whereupon, Plaintiff's Exhibit D was marked for  
16 identification.)

17 BY THE WITNESS: (Resuming)

18 A Correct, correct.

19 Q All right. I'm -- I'm gonna share my screen and  
20 we'll -- let me see -- okay, can you see this?

21 A Yes -- well --

22 Q It sometimes takes a second.

23 A Okay, I see it on --

24 Q Okay. It looks like it's two pages long; is that  
25 right?

1           A     Correct.

2           Q     Okay. And this is a true and accurate copy of the --  
3 of the contract between 25 Gents Inc. and Augusta-Richmond  
4 County for the event that we have been talking about?

5           A     Correct.

6           Q     Okay. Can you walk me through -- just kind of walk  
7 me through the first page, what everything means and -- and --  
8 and how the information in it is created?

9           A     Okay. First off, I get -- I already have all the  
10 information -- we -- we use -- it's called ACTIVE Net -- and I  
11 already have all the information for the organization of the  
12 25 Gents. And I go in and put their name in, which you see on  
13 the left here, organization name. And then the agent's name,  
14 which is Willie Washington, who I was telling you about. And  
15 then I go in -- down -- and I put the date, which is June  
16 14th, 2019 -- down there, and I put what time they wanna come  
17 in, and what time they wan to end the party. Now -- now,  
18 it's -- it's not 11:30 because -- because our computer does  
19 not -- it goes up to 11:30, but the party -- it should have  
20 probably ended at 12 midnight -- because our computer doesn't  
21 go up to 12 midnight -- I don't know why, but it doesn't.

22          Q     Okay.

23          A     And then it -- huh?

24          Q     I just said okay.

25          A     Okay. And then how many are attending. And then

1 that -- that -- that might not be accurate either, because once  
2 they come in and they -- and I put this in, which I -- I -- I  
3 have a contract -- yeah, it's -- where it says -- where I put  
4 it in -- January 16, 2019 -- which I don't know why that other  
5 one doesn't say that -- that I sent you -- but I've got the  
6 original one here in front of me. I found it. And if that  
7 changes, then -- then, basically, what they do is tell the --  
8 the guy that's over the casino, look, I said I was having 300,  
9 but I'm having 250 -- or I'm having 215, or something like  
10 that.

11 And then once you go down under customer questions, are  
12 you selling tickets -- and they did sell tickets to this event,  
13 and it -- they sold advance tickets -- and are you having  
14 alcohol, yes. And then it says here, are you -- requires a  
15 security officer, and it says, yes. And then -- and then --  
16 then they have to pay. And if you see on the back, you see  
17 that March 22nd they paid the full amount, eleven --

18 Q I'm scrolling to the second page because I think  
19 you're now talking about something on the second page.

20 A Oh, yes. Then you'll see where they paid the check  
21 March the 22nd, 2019.

22 Q Okay. And what's the June 21st, 2019 entry in  
23 there? What does that mean?

24 A That is when the -- that is after their event, they  
25 are given back the deposit if they cleaned up. That's what

1 that means. They cleaned up, so I gave them back --

2 Q But --

3 A The deposit.

4 Q Understood. So -- so -- so if they clean up their  
5 own events and there's no problem, they get their deposit back  
6 just like any other kind of a --

7 A Correct, correct.

8 Q Okay. Can you explain -- I'm gonna just ask you --  
9 under the -- it says contract number R4769 and then status  
10 completed up in the right hand corner. And then it's got a  
11 date of January 31st, 2022 at 12:23 p.m.

12 A I -- I have -- I'm gonna be honest with you, I have  
13 no idea. I have the original contract here and it says date,  
14 January 16th, 2019, if -- if you'd like me to send you that.  
15 I have -- I --

16 Q Yeah, can -- yeah, let's take another break so you  
17 can scan that original contract and --

18 A It'll take a few seconds, I'm sorry.

19 Q I -- no, I appreciate it, thank you.

20 A Okay.

21 THE VIDEOGRAPHER: Would you like to go off the  
22 record?

23 MR. CAUTHORN: Yeah. Let's -- We'll -- we'll just  
24 meet up for about five minutes. This is not gonna take  
25 long.

1 THE VIDEOGRAPHER: Excellent. And we are off the  
2 record at 9:53.

3 (Whereupon, a brief recess ensued after which  
4 Mr. Randolph Frails joined the proceedings.)

5 THE VIDEOGRAPHER: All right, and we are back on the  
6 record at 9:58.

7 BY MR. CAUTHORN: (Resuming)

8 Q I'm gonna share my screen again.

9 A Okay.

10 Q And this is gonna be Exhibits E to this deposition.

11 (Whereupon, Plaintiff's Exhibit E was marked for  
12 identification.)

13 BY MR. CAUTHORN: (Resuming)

14 Q And this is the document you just sent me here with a  
15 different -- and -- and it appears to be the same document  
16 except for the fact that instead of having a date of January  
17 31st of 2022, it's got a date of January 16th of 2019.

18 A Correct.

19 Q Okay. Do you know why the first document you  
20 produced to me had a date of January 31st of 2022?

21 A I have know earthly idea.

22 Q Okay. And it wasn't -- it wasn't created on January  
23 31st of 2022, was it?

24 A No, sir, it sure wasn't. It was created on -- on  
25 January's the 16th, 2019.

1           Q     Okay. Well, I -- that's -- let's talk about Exhibit  
2     E. That's the one you just sent that's dated January 16th,  
3     2019. How did -- how did the -- how did the date populate --  
4     how does the date populate in the -- in this contract when  
5     you -- when you fill it out?

6           A     That -- that means -- that means when it was formed.  
7     I -- I -- I put this in the computer on January the 16th, 2019.  
8     And I have no idea why it has that two thousand --

9           Q     Okay.

10          A     -- January -- I have no idea.

11          Q     Okay. But for some reason for this event on January  
12     14th -- or June the 14th of 2019, you have two contracts with  
13     the same number and one of them is dated January 16th of 2019  
14     and the other one is dated January 31st of 2022?

15          A     I -- yes.

16          Q     Okay. I'm gonna show you Exhibit A that I have right  
17     here.

18                     (Whereupon, Plaintiff's Exhibit A was marked for  
19     identification.)

20     BY MR. CAUTHORN: (Resuming)

21          Q     And I sent this to your attorney. And this is why,  
22     to be honest with you, I -- if I'd known that those two  
23     contracts -- the one from January -- from last week and the one  
24     from 2019 existed, we would've -- I would've -- I would've  
25     asked you for them before. But we had -- we sent an open

1 records request to the parks department some time ago and got  
2 139 pages back, and that -- that contract wasn't in it.  
3 Neither one of those contracts -- the one from January 31st,  
4 2022 or January of 2019 -- neither -- are you there? Your  
5 phone --

6 A Yeah. I -- I don't know what I did.

7 Q Oh, you might have accidentally hit the -- hit the --  
8 the -- the -- there's a camera logo.

9 A Yeah, but it's saying --

10 Q Let's go off the record for technical issues.

11 THE VIDEOGRAPHER: And we are off the record at  
12 10:01.

13 (Whereupon, a brief recess ensued.)

14 THE VIDEOGRAPHER: All right, and we're back on the  
15 record at 10:03.

16 BY MR. CAUTHORN: (Resuming)

17 Q Okay, all right. Do you -- I'm gonna show you --

18 A Okay.

19 Q -- Exhibit A. This is what we received in -- more  
20 than a year ago from the parks department as part of an open  
21 records request. Do you know who fulfills the parks  
22 departments open records requests?

23 A I was just told to get all the contracts I had --  
24 from the director, my boss, of all I had in 2019 at the casino.

25 Q Okay, so you -- so you're the one --

1           A     I --

2           Q     -- prepared --

3           A     I -- yeah -- so I did. I got all the ones that I  
4 had.

5           Q     Okay. And do you know why the -- the one -- the --  
6 the -- the one from -- that we just looked at for Exhibit D and  
7 Exhibit E, do you know why that wasn't in the production?

8           A     I -- I -- I -- I have no idea. I -- you know, I told  
9 them that, you know -- I mean, we didn't know what we were  
10 doing it for, and I don't know why that one wasn't in there.  
11 But it's -- it's been in the computer. I -- I don't -- I don't  
12 know. See, I file them. I -- I don't know why it wasn't in  
13 there.

14          Q     Okay. Did you -- did you pull paper files out and  
15 copy them --

16          A     Yes --

17          Q     -- and scan them --

18          A     Yes, correct.

19          Q     Let me -- let me finish my question. Just --

20          A     Okay.

21          Q     Okay. I'm not -- I don't wanna be rude. I'm just  
22 trying to make sure that I finish my question, so that when  
23 you're answer --

24          A     Yeah.

25          Q     -- is made, it's the answer that needs to go to my



1 question. I know that we're -- that you're anticipating what  
2 I'm asking, but some -- but for deposition purposes, I need --  
3 need it to be pretty clear in the transcript, okay?

4 A Uh-huh (affirmative).

5 Q Okay. So when you created the open records request  
6 that you provided to our law firm, did you pull paper files and  
7 scan them, or did you print from a computer electronically  
8 stored documents from a computer?

9 A I pulled all my paper files. I did not go to the  
10 computer.

11 Q Okay. So does that mean that there was not a paper  
12 file related to the June 14th 25 Gents event?

13 A There was -- there was one in the computer. I don't  
14 know why it wasn't in my file, if you did not receive it. But  
15 there was one in the computer.

16 Q Okay. Did you -- and when you just produced  
17 Exhibit D and Exhibit E to me, how did you produce those?

18 A You mean the one I just gave you?

19 Q Yes, ma'am, the ones --

20 A I -- yeah -- I went on the computer and -- I went to  
21 June 14th in -- on my computer on the Julian Smith Casino  
22 page -- and I went to June 14th, 2019, and it's right there.

23 Q Okay. And there --

24 A And it has the --

25 Q Okay. And it -- so there's -- there are two separate

1 documents stored in that computer for June 14th, 2019?

2 A No. I just printed you the one out -- the first  
3 one -- I printed it off the computer. And then I had another  
4 copy of it in a file -- when all this was going on I had  
5 another copy of it because -- I don't know how that date  
6 changed. I'm -- I -- I have no idea.

7 Q Okay. Did -- did you print a copy of it on January  
8 31st of 2022?

9 A It's -- I have -- I -- I don't think I did. Somebody  
10 else could have, but I -- I don't think I did.

11 Q When did you create the paper file for the June  
12 14th, 2019 event?

13 A When did I do the -- do the contract?

14 Q No. You just said that you had one that's on the  
15 computer and one that's on paper. And I was gonna ask -- and I  
16 was asking you --

17 A Oh, Oh. I -- when -- when all this was going on and  
18 we had to have all the -- all the things, I just -- I just -- I  
19 had -- I had one in my -- in a -- in a file.

20 Q All right. And when you say all this was going on,  
21 are you talking about this lawsuit?

22 A It was in the paper. They asked us about the  
23 situation that was in the paper, and they wanted to know what  
24 went on June 14th. So I -- I made a copy of that -- of that  
25 contract when -- when it was first in the paper. Because when

1 you look in the paper and it says Julian Smith Casino, you're a  
2 little concerned about what's going on at Julian Smith  
3 Casino -- which it didn't have anything really to do with us,  
4 because this thing -- you know, this thing happened off our  
5 grounds -- so they asked us to get all the information. So I  
6 made a copy of the contract from the computer so I could have a  
7 file of what was in the paper. I have copies of what was in  
8 the paper about Julian Smith Casino.

9 Q Okay. And who asked you about -- about what was in  
10 the paper?

11 A My boss --

12 Q Okay. And what was in the paper? I don't -- I don't  
13 know --

14 A Augusta Press -- Augusta Press -- let me get -- I  
15 don't even know where my file is -- Augusta Press had it in  
16 there, and then a couple of days later it was in the -- this is  
17 it -- this was August 2021. It says, lawsuit claims deputy off  
18 book detail rape. And he was not off book, so that -- and then  
19 I had another one that was in the Augusta -- it was from the  
20 Augusta Press. It says, Richmond County Sheriff assaulted  
21 woman at Julian Smith Casino.

22 Q Gotcha, okay.

23 A And that was a big concern with us that it was at  
24 Julian Smith Casino. And then if you read the article, it says  
25 it did not happen at Julian Smith Casino.

1 Q Okay, okay. Now, when I -- have you read the  
2 complaint in this case?

3 A Yes.

4 Q Okay. And I don't think we allege that the -- that  
5 the rape happened at Julian Smith, did we?

6 A No, you did not. But it was all in the paper that it  
7 happened at Julian Smith in the big -- in the big headlines, so  
8 I had to look into it.

9 Q Okay. So did -- did you guys -- with this event on  
10 June 14th of 2019, did you guys -- and I say you guys, I  
11 mean -- I mean the parks and recreation department -- did y'all  
12 have any communications with Deputy Charlie Walker?

13 A I didn't. I don't even know who he is.

14 Q Okay, okay. And I think I may have asked this  
15 before, but I wasn't -- I'm not sure the answer was clear to  
16 me. When a sheriff's deputy provides security at an event at  
17 Julian Smith Casino, does -- is -- is that sheriff's deputy  
18 supposed to be -- is -- is that sheriff's deputy working, or is  
19 that extra duty, like private security duty that the sheriff's  
20 deputy provides on his own time?

21 A Well, they're getting paid, so I'm just assuming it's  
22 extra duty because I -- you can't get -- you can't get paid  
23 twice.

24 Q Okay. Does the parks department communicate with the  
25 sheriff's office to find out who is gonna be the -- the officer

1 providing security?

2 A Yes. They send us a name back and let us know by  
3 email.

4 Q Okay. And do y'all have emails from June 14th  
5 from -- for this event?

6 A That -- that's something that I wouldn't receive. It  
7 would be Darrell Mayle. He receives that.

8 Q Can you spell that name for me?

9 A D-A-R-R-E-L (sic) M-A-Y-L-E. He is over the Julian  
10 Smith Casino.

11 Q So for -- and I'm gonna ask a general question, and  
12 then I'm gonna ask a smaller -- a more -- more refined  
13 question. So generally, when there is -- there is security  
14 provided by the sheriff's department at a parks and recreation  
15 facility where there is a private event being held, the  
16 communications about the -- who the officer is gonna be and all  
17 that is transmitted directly to the person who's in charge of  
18 that facility?

19 A Correct.

20 Q Okay. So was -- specifically to Julian Smith Casino,  
21 when there is an event where the sheriff's department is  
22 providing security, the sheriff's department communicates  
23 directly with Darrell Mayle -- Mayle?

24 A Correct.

25 Q Did you say correct to Darrell Mayle, or correct that

1 they communicate directly with him?

2 A They -- correct -- they -- they communicate directly  
3 with him. It is his job to make sure that he communicates with  
4 the police officers and the firemen.

5 Q Okay, understood. At the actual event, are there any  
6 parks department people at the -- who -- who are required to  
7 attend events at the -- at the facilities?

8 A Yes.

9 Q Okay. And how -- how does that work? Explain to me  
10 how that -- how that works and -- and -- and what the  
11 department does with regard to their personnel being at events.

12 A Every one of our buildings that are indoor buildings  
13 does have to have a staff person, or more than one staff  
14 person, there during the event. That's to make sure everybody  
15 is doing what they're supposed to be doing, you know. And if  
16 there's lights or anything that needs to be done there, they  
17 have to be there during the entire event, even setting up and  
18 cleaning up. This event with the 25 Gents was over 200 people,  
19 so it would require two staff people to be there.

20 Q Okay. Do you know who was working there on June  
21 14th?

22 A I do.

23 Q Who was working there?

24 A Alzater Johnson and Gerald Smith.

25 Q How do I spell Alzater?

1 A A-L-Z-A-T-E-R.

2 Q And Gerald Smith?

3 A Gerald Smith.

4 Q Okay. Who is Alzater Johnson?

5 A She works with us part time at the Julian Smith  
6 Casino.

7 Q Okay. Who is Gerald Smith?

8 A Gerald Smith is a full-time employee with us that  
9 works at McDuffie Woods and he helps out with rentals.

10 Q And when you say he helps out with rentals, what --  
11 can you -- can you be -- can you elaborate on that?

12 A You can -- you can assign any staff. They don't  
13 necessarily have to work at Julian Smith Casino.

14 Q You just have to fill in with coverage?

15 A Correct.

16 Q Okay, I understand. So when there's an event that's  
17 big and you have two people, you gotta find two people to -- to  
18 work at it?

19 A Correct.

20 Q Okay, all right. So Alzater Johnson and Gerald Smith  
21 were at Julian Smith Casino working for the parks department on  
22 June 14th, 2019?

23 A Correct.

24 Q Okay. Is it -- do you know if anybody that works in  
25 the parks department is a member of 25 Gents?

1           A     Of my knowledge, no.

2           Q     Okay. Do you know if anybody that works at the parks  
3 department goes to the 25 Gents events as a -- as a guest, not  
4 working, but as a participant in the festivities?

5           A     I -- I have no idea, but as far as I know, no. But  
6 I -- I do not know.

7           Q     Okay. What is Darrell Mayle's email?

8           A     JMayle@augustaga.gov

9           Q     Okay. And that's M -- J-M-A-Y-L-E?

10          A     Correct.

11          Q     Okay. What is your email -- your work email?

12          A     CKuhlke@augustaga.gov

13          Q     Okay. When did -- when did the parks department  
14 first find out about the -- the allegations made by Ms. Colon?

15          A     When it was in -- I -- I found out when it was in the  
16 Augusta Press, and it said rape -- I'm not sure, but it -- it  
17 listed Julian Smith Casino. And that's when we -- that's when  
18 they wanted to know who -- who was that date and everything.  
19 That's -- that's how I got that contract.

20          Q     Okay. Were you ever made aware of a -- of a -- of  
21 a -- of a letter sent to the county commissioners and the  
22 sheriff and the -- and the mayor back in 2020 -- in April  
23 of 2020?

24          A     No, sir.

25          Q     Have there ever been any other allegations of any



1 kind of improper behavior or injury of a guest at a Julian  
2 Smith Casino event?

3 A Not of my knowledge.

4 Q Are the -- are the people who rent the facilities  
5 required to purchase any kind of insurance for the event?

6 A No, sir.

7 Q Okay.

8 A I mean, it all depends on what kind of event, which  
9 we -- they can't have over a certain amount of -- of people at  
10 the casino because it only holds 350.

11 Q So 350 is the maximum number of -- of --

12 A Well, you can have -- you can have up to 400, but we  
13 say 350.

14 Q Okay. But what I mean is the -- is the -- the county  
15 doesn't require any kind of certificate of insurance for  
16 hosting any -- any events at Julian Smith Casino?

17 A If you are selling tickets and you are having a huge  
18 event, at the door you would have to have insurance. But we  
19 don't have very many of them because you have to have four  
20 police officers, two firemen, and four staff members --

21 Q How many --

22 A -- contract.

23 Q How many -- how many -- how many law enforcement  
24 officers -- police or sheriff -- were working at the June  
25 14th event?

1           A     One.

2           Q     Okay. And how do you decide how many are supposed to  
3 work a particular event?

4           A     You would have to have -- you would have to have --  
5 it's -- it's over 300, you would have to have two police  
6 officers.

7           Q     Okay, so if it's under 300, it's one? And if it's  
8 over 200, its two?

9           A     Correct.

10          Q     And if you're --

11          A     Over 300.

12          Q     Okay, over 300 its two, right?

13          A     Yes.

14          Q     And if you're selling tickets at the door, it's four?

15          A     Correct. And it all depends on what kind of event it  
16 is really. That's when the director decides, if you're selling  
17 tickets at the door. Because if it's a bridal show and you're  
18 selling tickets at the door, you don't need four police  
19 officers. So it's basically up to the director. He has to --  
20 he has to tell you exactly how many people you would have to  
21 have.

22          Q     And you mean -- are you referring to the director of  
23 the parks and recreation department?

24          A     Correct, uh-huh (affirmative).

25          Q     What's that person's name?

1           A     Maurice McDowell.

2           Q     Who was the director in -- on June 14th of 2019?

3           A     Oh, what's his name -- I'm sorry, I'm -- I'm going  
4 blank -- I'm going blank -- you're gonna have to give me -- I  
5 can't remember his name. Can I call somebody?

6           Q     Phone a friend? No, that's --

7           A     I -- can I phone a friend?

8           Q     No, that's okay. That's okay. That's a piece of  
9 information I can get somewhere else. If you knew it, I was  
10 gonna --

11          A     We've had -- we've has so many, so.

12          Q     How long has the current director been in their  
13 position?

14          A     About two years.

15          Q     Okay. So -- so the director in June of 2019 was the  
16 immediate predecessor of the current director?

17          A     Correct, correct.

18          Q     Do you know why the director left the parks  
19 department?

20          A     I have -- no, sir.

21          Q     Okay. Any rumors about why the director left?

22          A     No, sir. No, sir.

23          Q     Okay. I'm gonna share my screen again. Let's see.  
24 This has been labeled Exhibit C for this deposition.

25                (Whereupon, Plaintiff's Exhibit C was marked for

1 identification.)

2 BY MR. CAUTHORN: (Resuming)

3 Q This is a -- Title 6 of the Augusta-Richmond County  
4 Code of Ordinances, and I wanted to just kind of -- just point  
5 out a couple of things and see if that is consistent with the  
6 park's policies. And I believe they are, because what you  
7 described to me in general terms earlier appear to be what is  
8 included in these regulations. Are you there?

9 A Yes, God, darn it.

10 Q Okay. All right, first I wanna -- these are Bates  
11 numbered. Richmond Code Title 60001, do you see that on the  
12 bottom right of that first page?

13 A Yes -- 001 -- I see that, yes.

14 Q We're gonna go to page 43, and this is Section  
15 6-2-77. Do you see that on there?

16 A Wait a minute.

17 Q Uh-huh (affirmative).

18 A Wait -- I'm sorry, I'm making it bigger --  
19 information provided -- no -- which number is it -- four,  
20 five --

21 Q 6-2-77. Do you see that?

22 A Hold on a second.

23 Q Uh-huh (affirmative).

24 A It's not -- I can't see it -- I --

25 Q Are you on your phone?

1           A     I'm on my phone.

2           Q     All right. Well, I will -- what I'll do is I'll just  
3 represent to you that this reads to me like what you were  
4 talking about as the application for an occasional, single  
5 event license for on-premises consumption of alcoholic  
6 beverages.

7           A     Uh-huh (affirmative).

8           Q     And it says that a nonprofit may apply for a license  
9 whether or not they possess a -- an alcohol license. And  
10 that's -- that's what you were talking about before, that a  
11 nonprofit --

12          A     That's what --

13          Q     -- a license?

14          A     Uh-huh (affirmative), correct.

15          Q     Right?

16          A     Right.

17          Q     Okay.

18          A     You have to be nonprofit, yes.

19          Q     Okay. And then I'm gonna go to page 21 real quick.  
20 Do you see right here where it says Section 6-2-4 -- sorry,  
21 Section 6-2-5?

22          A     Yes. I see it in -- in general, okay.

23          Q     Okay. And this is about -- this is a part of the  
24 code of ordinances.

25          A     Okay.

1           Q     Are you familiar with this part of the code of  
2 ordinances where it's -- it's the -- the -- the consumption of  
3 alcohol at public parks and public areas?

4           A     No -- to sell or offer to sell -- are you talking  
5 about number B?

6           Q     No. I'm talking about Section 6-2-5, sorry.

7           A     Oh, okay.

8           Q     Do you see that section?

9           A     Uh-huh (affirmative).

10          Q     Okay.

11          A     That means outdoor, correct?

12          Q     I -- well, I read it as all -- as public space. It  
13 says, it shall be unlawful for any one -- any person to serve  
14 or consume alcohol or offer for the purpose of consumption to  
15 anyone else or to be in possession of beer, wine, or any type  
16 of intoxicating liquor or beverage, in and on any public park,  
17 playground, or public building thereon, or other public area  
18 owned or operated by Augusta, at any time whatsoever, with the  
19 exception of -- and the first one there listed is Julian Smith  
20 Casino. Do you see that?

21          A     Where -- where are you? Okay, I --

22          Q     I'm at the top right. Do you see that?

23          A     I don't -- okay, yeah -- okay --

24          Q     Okay.

25          A     Yes, I see.

1 Q And is that consistent with what you understand the  
2 park policies to -- the parks and recreation policies to be,  
3 that -- that --

4 A Correct.

5 Q Okay, okay. And then if you look at subsection (B)  
6 down here it says that, prior written approval must be obtained  
7 from the Sheriff of Richmond County, Georgia, and the Director  
8 of the Recreation Department, when alcoholic beverages are  
9 served or consumed at Julian Smith Casino. Do you see that?

10 A Uh-huh (affirmative).

11 Q Okay. And that seems consistent with the park  
12 policy -- or with the parks and rec policy that you were just  
13 describing to me; is that -- is that right? Is that the park  
14 policy that y'all have to get approval from the sheriff and  
15 from the director of the recreation department before there can  
16 be alcoholic beverages consumed or served at Julian Smith  
17 Casino?

18 A Correct.

19 Q Okay. Now I'm gonna show you page 105 here. Okay,  
20 and this is about -- this is Chapter 8 -- this is Attendance of  
21 Deputies and Firefighters, Section 6-8-1 --

22 A Uh-huh (affirmative).

23 Q -- and it's when they're required. And it says, the  
24 manager of, or any person giving, any public amusement show,  
25 exhibition or performance, any public ball, any dances either

1 public or private, or any gathering at public facilities when  
2 alcohol is being served, or any occasion where the chief of the  
3 fire department and/or sheriff determine in their sole  
4 discretion that due to the nature of the function and/or  
5 facility, attendance of sheriff's deputies and/or firefighters  
6 is necessary, shall have in attendance such number of deputies  
7 and/or firefighters as shall be assigned by the chiefs of the  
8 respective departments.

9 I read that to say that if you're having a dance where  
10 there's alcohol, you are required to provide firefighters and  
11 deputies as -- as designated by the -- by the sheriff's  
12 department and the fire department. Is that consistent with  
13 what you understand parks and recreational policy to be?

14 A Yes.

15 Q Okay. And it says that the person -- the manager or  
16 other person mentioned in the preceding section shall apply to  
17 the sheriff's department and the fire department to learn  
18 whether or not the attendance of deputies and/or firefighters  
19 is required.

20 Now, you said they -- they -- that -- that you talk to the  
21 fire department. Do you talk to the fire department and the  
22 sheriff's office -- or the police on their behalf, or do they  
23 talk directly to the sheriff's office and the fire department  
24 on their own behalf as a part of the application process?

25 A They don't call, but we do. We -- we -- we get it



1 assigned.

2 Q Okay. And then you find out about the assignment of  
3 the police and then you let the person planning the event know?

4 A Correct.

5 Q Okay. This says -- on Section 6-8-3 it says  
6 generally that the -- that the person who's hosting the event  
7 is responsible for paying the sheriff's deputy and the -- and  
8 the firefighter. Do they -- do they pay the -- the sheriff's  
9 deputy through the parks department, or do they pay them  
10 directly?

11 A They pay them directly. They pay them cash the day  
12 of.

13 Q Okay. So literally when a -- when a sheriff's deputy  
14 provides security at an event at Julian Smith Casino, at the  
15 end of the event whoever is in charge of the event gives them a  
16 check or -- or cash?

17 A No. They get cash. And they get it before the event  
18 is over.

19 Q Okay, okay. And they get it right there, like at the  
20 event at the facility?

21 A Right, correct.

22 Q Okay. Do you know who would have paid Charlie Walker  
23 on June 14th of 2019?

24 A I -- I have no idea.

25 Q Okay. And do you know if Charlie Walker was there

1 providing security on June 14th of 2019 at the 25 Gents  
2 event?

3 A I was told he was, but I wasn't there.

4 Q I understand. And that would be -- Darrell Mayle  
5 would have been the one who -- who -- who got that -- received  
6 that information, correct?

7 A Correct.

8 Q Okay. So somewhere Darrell Mayle would have an email  
9 from the sheriff's department saying that Charlie Walker is  
10 gonna be assigned security at the June 14th, 2019 event at  
11 Julian Smith Casino?

12 A He should have -- he -- he should have had an email,  
13 or he could have talked to him. I don't know. You'd have to  
14 ask him.

15 Q Understood.

16 A But you're supposed to get an email, yes.

17 Q Understood. You don't -- you don't get in the weeds  
18 at that level?

19 A I mean, I -- I do if I have to because I'm his  
20 supervisor. But he -- he does a good job and I let him do  
21 that.

22 Q Understood. So this is gonna be Exhibit C to the --  
23 to the deposition, this 105 pages that is -- that is Title 6 of  
24 the Richmond County Code. We're gonna have an Exhibit A, C, D,  
25 and E. I don't believe we're gonna have an Exhibit B.

1           So I'm gonna show you page 44 of this same Title --  
2 Title 6. And this is -- this is from Section 62-77 (sic) --  
3 6-277 (sic) and it's the -- and -- and I wanna show you  
4 subparagraph (9). And a. under a subparagraph (9) -- can you  
5 see what I'm looking at? And I'll read it and see if -- see if  
6 that's consistent with y'all's policy.

7           A     I see that, yeah. I see that nine,  
8 uh-huh (affirmative).

9           Q     It says, the Director of License and Inspection shall  
10 forward the application to the Recreation Department Director,  
11 if applicable, then forward to the Richmond County Sheriff, who  
12 shall indicate his approval or disapproval of the application.

13           And with the application, they're talking about the  
14 application for the alcohol permit.

15           A     Okay.

16           Q     Is that consistent with your understanding of how  
17 that works?

18           A     Well, I know that we received it before the event,  
19 yes.

20           Q     Okay. And --

21           A     And that would be -- who received it, if they need  
22 one.

23           Q     And -- and the approval comes through the director of  
24 license and inspection and the sheriff's department, not  
25 through the parks department, right?

1 A Correct.

2 Q Okay.

3 A If -- if they -- permit.

4 Q That's -- I --

5 A I --

6 Q Correct. Yeah, I -- I'm not --

7 A -- need it, yes.

8 Q Yeah. And -- and it's the parks department position  
9 that the 25 Gents did not need a permit because they were  
10 having a bring your own alcohol event?

11 A Correct.

12 Q Okay, okay. And that's the parks department  
13 understanding for decades, that the 25 Gents events has been a  
14 bring your own alcohol event?

15 A Correct.

16 Q Okay. So they never -- so y'all didn't -- so y'all  
17 didn't ask for any kind of permit, and no permit was applied  
18 for, and no permit was given; is that right?

19 A Correct.

20 Q Okay. What is the significance of the -- the  
21 permitting process? And -- and -- and let me explain to you  
22 what I mean. So you've got a bring your own beer event versus  
23 a -- versus a provided alcohol event.

24 A Uh-huh (affirmative).

25 Q Why does the parks department distinguish between a

1 bring your own beer event versus a provide alcohol event?

2 A If you're providing alcohol and there's -- there is  
3 money on the premises and they are selling it, that goes to a  
4 whole 'nother level. You will have to have a permit. If you  
5 bring your own and they have it, you know, right there at the  
6 table and everything else, then -- and you're not exchanging  
7 money, it's totally different. Now, that's what is -- was  
8 explained to us from the license and inspection department.

9 Q Okay. Are there any security requirements that are  
10 different if you are providing alcohol versus if you are  
11 bringing your own?

12 A No.

13 Q Okay. So if you have fewer than 300 people and  
14 you're providing alcohol, you're still only going to have one  
15 sheriff's deputy working security?

16 A Correct.

17 Q Okay. Let me look at my notes real quick and -- and  
18 we'll take ten. And then I'll have a few more question, but  
19 we're approaching the end of -- the end of my questioning. So  
20 just give me a few minutes, Ms. Kuhlke, and -- and I'll come  
21 back and we'll finish this thing up, okay?

22 A Okay, thank you.

23 THE VIDEOGRAPHER: We are off the record at 10:37.

24 (Whereupon, a brief recess ensued.)

25 THE VIDEOGRAPHER: We are back on the record at

1 10:41.

2 THE WITNESS: Okay.

3 BY MR. CAUTHORN: (Resuming)

4 Q I've got follow-up -- a couple of follow-up questions  
5 just to clarify some things. When -- when you -- you've used  
6 the phrase bring your own alcohol a couple of times in this  
7 deposition. And you have said that when you bring your own  
8 alcohol, you don't have to apply for a permit or license for  
9 alcohol. That's -- that's my understanding. Is that -- is  
10 that a fair statement of what -- of what you have -- you said?

11 A Correct.

12 Q Okay. So when you say bring your own alcohol, who  
13 are you referring to bringing their own alcohol? Are you  
14 referring to the host of the event, or are you referring to the  
15 individual guests of the event?

16 A Individual guest.

17 Q Okay. Do you understand why I'm trying to  
18 distinguish that?

19 A Correct.

20 Q Okay.

21 A Uh-huh (affirmative).

22 Q So if I'm hosting a -- if I am hosting a party like  
23 the one on June 14th and I've got an open bar --

24 A That's --

25 Q -- I'm not selling alcohol -- just a minute -- I'm

1 not selling alcohol --

2 A Right.

3 Q -- but I am providing alcohol. Would I be required  
4 to get a permit?

5 A If you are providing alcohol and you do not charge  
6 for that alcohol, you would not need a permit. But if you are  
7 charging and you're charging -- even in -- let's say a  
8 ticket -- you would have to have alcohol -- I mean, an alcohol  
9 license because you are selling that alcohol. And that person  
10 that's giving the party is providing it, and it is provided on  
11 that ticket.

12 Q Okay, thank you. I think that's -- I think that's  
13 all the questions I have for you, Ms. Kuhlke, subject to any  
14 kind of follow ups if -- if Ms. Haynes or Mr. Frails have any  
15 questions.

16 A Okay.

17 DIRECT EXAMINATION

18 BY MS. HAYNES:

19 Q I just have one question, Ms. Kuhlke, I just want to  
20 clarify. You've been using like the word police and police  
21 department. When you say that, are you referring to the  
22 Richmond County Sheriff's Office?

23 A Correct, correct, yes.

24 Q Okay, thank you.

25 MR. CAUTHORN: Thanks for clearing that up because I

1 actually was -- I trying to figure out if she meant both  
2 of them or the sheriff. Because the ordinance says  
3 sheriff, not police, and I -- and there is a difference,  
4 so thanks.

5 MS. HAYNES: Yeah. We don't have police.

6 MR. CAUTHORN: I -- I -- I -- I didn't -- I was  
7 wondering.

8 THE WITNESS: It's the same.

9 MR. CAUTHORN: No, I mean, I understand for purposes  
10 of someone who lives in Augusta-Richmond County, that's  
11 basically the same thing. Because when the sheriff  
12 provides the police protection, that -- the -- in your --  
13 in the -- in an individual's mind, there's not much of a  
14 difference. But for purposes of this lawsuit, there is  
15 a -- there is a difference.

16 THE WITNESS: Okay.

17 MR. CAUTHORN: Okay. So thank you for clarifying.  
18 And I hope that you have a good weekend and thank you for  
19 your time.

20 THE WITNESS: Okay, thank you.

21 MR. CAUTHORN: We are -- do y'all -- Ms. Haynes, are  
22 y'all gonna read and sign?

23 MS. HAYNES: No. And I will call Ms. Johnson and see  
24 if she can come early.

25 THE WITNESS: I don't know how to turn this off.



1 MR. CAUTHORN: Okay. Let me -- I'm gonna email you  
2 my cell phone --

3 THE COURT REPORTER: Ms. Kuhlke --

4 MR. CAUTHORN: -- because I'm -- I'm gonna step away  
5 from my desk for about 15 minutes or so. So I'm gonna  
6 email you my cell phone, and you can call me or text me --  
7 or whatever you wanna do -- and let me know if she's gonna  
8 be ready by -- say like 11:30 or 11:15 or 11:00.

9 MS. HAYNES: Okay.

10 MR. CAUTHORN: Okay?

11 MS. HAYNES: All right.

12 MR. CAUTHORN: All right, thank you.

13 MS. HAYNES: Uh-huh (affirmative).

14 THE VIDEOGRAPHER: We are off the record at 10:45.

15 (Whereupon, the deposition concluded at 10:45 a.m.)  
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C E R T I F I C A T E

STATE OF GEORGIA )

COUNTY OF FULTON )

I, JENNIFER A. GERBER, Certified Court Reporter in and for the State of Georgia, do hereby certify that the foregoing proceedings were taken down by me; that the foregoing proceedings were reduced to print by me; that the foregoing pages represent a true, correct, and complete transcript of the testimony given by the witness, who was first duly sworn by me; that I am not a relative, employee, attorney or counsel of any of the parties; that I am not a relative or employee of attorney or counsel for any of said parties; nor am I financially or otherwise interested in the outcome of the action.

This certification is expressly withdrawn and denied upon the disassembly, photocopying, reproduction of electronic copies, and/or distribution of the foregoing transcript, or any part thereof, including exhibits, unless said disassembly, photocopying, reproduction, and/or distribution is done by me and my signature and original seal is attached thereto.

I further certify that the original of said deposition shall be filed under seal with J. Wickliffe Cauthorn, Attorney at Law; The Cauthorn Firm, 201 Cherokee Street, Marietta, Georgia.

This, the 14th day of February, 2022.



JENNIFER A. GERBER

CERTIFIED COURT REPORTER # 6241-2465-4151-2704

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STATE OF GEORGIA )

COUNTY OF FULTON )

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2. I am a Georgia Certified Court Reporter

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4. Rodman Reporting was contacted by the office of the  
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JENNIFER A. GERBER

CERTIFIED COURT REPORTER # 6241-2465-4151-2704

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9:53 (1)  
24:2  
9:58 (1)  
24:6  
9-11-28c (1)  
4:4